

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

DELOIS EDMONDSON,	:	
Plaintiff,	:	
v.	:	
	:	
JOHN E. POTTER,	:	Civil No.: S-02-2803
POSTMASTER GENERAL,	:	
U.S. POSTAL SERVICE,	:	
Defendant.	:	

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JOINT MOTION TO AMEND SCHEDULING ORDER

Plaintiff and Defendant, through their respective counsel, hereby file this Joint Motion to Amend Scheduling Order, and for good cause state as follows:

1. This is an employment discrimination case arising out of allegations of, among other things, failure to grant reasonable accommodation, hostile work environment, and retaliation.
2. The current Scheduling Order designates a discovery cut-off date of April 11, 2003, motions deadline of May 12, 2003, and a pre-trial conference date of July 11, 2003.
3. The parties have completed written discovery. Plaintiff is in the process of producing voluminous medical records, and the postal service is organizing its personnel files and records to be produced to Plaintiff. The parties have also begun to schedule depositions. Coordinating the schedules of agency counsel and the postal service employees has been difficult. In addition, at least one of the postal service employees is unavailable for deposition until after the current discovery cut-off date. It is also anticipated that after the parties are deposed, additional depositions and/or discovery may be necessary.

4. Counsel for both parties agree that the Scheduling Order should be extended by sixty (60) days. The parties anticipate that a sixty (60) day extension will be adequate to allow for the exchange of records and to allow the parties to complete all depositions.

5. For the reasons set forth above, the parties have consented to amending the Scheduling Order by extending the dates set forth therein by sixty (60) days.

6. An amendment to the Scheduling Order will not cause unnecessary delay or affect judicial economy, and the interests of the parties and the Court in this regard will best be served if the Scheduling Order is amended as requested.

WHEREFORE, the parties respectfully request that this Court grant the foregoing Joint Motion to Amend Scheduling Order, that it enter an appropriate Order ratifying the parties' proposed Scheduling Order, and that it provide the parties with any additional relief that it deems just and appropriate.

Respectfully submitted,

Thomas M. DiBiagio
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By: _____ /s/

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